

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Administration of the North American Number)	CC Docket. No. 92-237
Plan Carrier Identification Codes (CICs))	
)	DA 05-1154
)	
)	

**SBC RESPONSE TO COMMISSION’S REQUEST TO REFRESH RECORD ON CARRIER
IDENTIFICATION CODE (“CIC”) CONSERVATION AND DEFINITION OF “ENTITY” FOR
PURPOSES OF CIC ASSIGNMENTS**

Consistent with its previously filed comments in this proceeding,¹ SBC continues to support, with limited modifications, the Report and Recommendations of the CIC Ad Hoc Working Group to the North American Numbering Council (“NANC”) Regarding Use and Assignment of Carrier Identifications Codes (“CICs”).²

Specifically, SBC continues to support the use of guidelines developed through industry consensus for CIC assignment administration, rather than imposing mandates via regulatory fiat. In addition, insofar as the Commission finds it necessary to exercise additional oversight in CIC administration, SBC believes that the NANC’s previous recommendations on this topic represent the most reasonable approach to CIC administration.

Also, consistent with SBC’s previously filed comments, SBC believes that it is necessary to modify the definition of the term “entity” provided in the NANC recommendations. The term,

¹ A copy of SBC’s previously filed comments are attached hereto.

² Report and Recommendations of the North American Numbering Council (NANC) to the FCC regarding the use and assignment of Carrier Identification Codes (“CICs”) (filed February 5, 1998). (“Recommendations”)

as previously defined in the NANC recommendations, is overly restrictive and does not adequately account for the circumstances of various providers (such as SBC, its affiliates and subsidiaries) that have more stringent requirements for structural separation than other entities.

Finally, because these issues have not been considered since 1998, it may be prudent for the Commission to again refer these issues back to the NANC for additional consideration.

Respectfully submitted,

/s/ Jim Lamoureux

Jim Lamoureux
Gary L. Phillips
Paul K. Mancini

SBC COMMUNICATIONS INC.
1401 Eye Street, N.W., Suite 400
Washington, D.C. 20005
(202) 326-8895 – Voice
(202) 408-8745 – Facsimile

Its Attorneys

July 1, 2005